

UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA
(Alexandria Division)

UNITED STATES OF AMERICA,)	
)	
)	
v.)	Case No. 1:20-mj-00114-JFA
)	
)	
ZACKARY ELLIS SANDERS,)	
)	
Defendant.)	

DEFENDANT ZACKARY ELLIS SANDERS' REPLY TO THE GOVERNMENT'S
OPPOSITON TO DEFENDANT'S MOTION FOR REVOCATION OF
DETENTION ORDER AND REQUEST FOR EXPEDITED HEARING

Defendant Zackary Ellis Sanders, by and through his undersigned counsel, and pursuant to 18 U.S.C. § 3145(b), respectfully submits the following in reply to the Government's response in opposition to his motion for revocation of the Court's Detention Order.

The facts alleged by the Government are disturbing. Mr. Sanders further recognizes that the conduct charged in the criminal complaint triggers the rebuttable presumption set forth in 18 U.S.C. § 3142(e)(3)(E). That said, Mr. Sanders submits there is evidence to suggest that the presumption is unwarranted, and there are conditions of release that will reasonably assure the safety of any other person and the community and also assure his appearance at future court proceedings.

The Defendant's father is Dr. Jay Sanders. He is the CEO of the Global Telemedicine Group, an Adjunct Professor of Medicine at the Johns Hopkins School of Medicine, and a Founding Board Member and President Emeritus of the American Telemedicine Association. Dr. Sanders works from his home.

Mr. Sanders' mother is Dr. Risa Sanders. Dr. Sanders is a Licensed Clinical Psychologist. She too works from her home.

Mr. Sanders' parents have taken steps, and will take any further actions directed by this Court, to demonstrate that they can serve as third-party custodians. Dr. Risa Sanders has purchased a safe to secure her laptop and her husband's laptop. Dr. Risa Sanders will also remove all other devices from the family home, and she will change the password to the internet in her home.

Dr. Risa Sanders will take over and/or windup Mr. Sanders' business to ensure he has no contact with anyone under the age of 18. Indeed, even though we would expect that Mr. Sanders would be subjected to GPS monitoring, since both of Mr. Sanders' parents work from home, they can make sure that he does not leave the home, except for medical or legal visits. In those, instances Jay or Risa Sanders will accompany Mr. Sanders to those appointments.

Mr. Sanders was cooperative with law enforcement. This shows that he will also cooperate with his parents.

While the Alexandria Sheriff's Office has taken steps to deal with the pandemic, it is clear that Mr. Sanders' medical conditions make him more susceptible to contracting this deadly disease.

Section 3142(c)(1)(B) provides that in any case involving a minor victim, any release order must contain, at a minimum, the following conditions:

1. Abide by specified restrictions on personal associations, place of abode, or travel;
2. Avoid all contact with an alleged victim of the crime and with a potential witness who may testify concerning the offense;

3. Report on a regular basis to a designated law enforcement agency, pretrial services agency, or other agency;
4. Comply with a specified curfew;
5. Refrain from possessing a firearm, destructive device, or other dangerous weapon; and
6. Submit to electronic monitoring.

See 18 U.S.C. § 3142(c)(1)(B)(iv)-(viii). In addition to those conditions, Mr. Sanders respectfully proposes the following conditions, which will reasonably assure his appearance as required, and will safeguard the safety of the community:

1. Release into the custody of his parents;
2. Surrender of his U.S. Passport;
3. Home detention, with permission to leave his home for meetings with his attorneys or medical appointments, accompanied by one of his parents;
4. No access to the internet; and
5. No contact with minor children.

For the foregoing reasons, and any other reasons appearing to the Court, Mr. Sanders respectfully requests that this Court grant his request for pretrial release, subject to the conditions set forth above.

Respectfully submitted,

/s/ Steven J. McCool, Esq.

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CERTIFICATE OF SERVICE

I hereby certify that on this 1st of April 2020, the foregoing was served electronically on the counsel of record through the U.S. District Court for the Eastern District of Virginia Electronic Document Filing System (ECF) and the document is available on the ECF system.

/s/ Steven J. McCool, Esq.
STEVEN J. McCOOL